

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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U.S. DISTRICT COURT
SAN JUAN, P.R.

7 de junio 2022

María A. Clemente Rosa

PETITIONER

V.

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

PROMESA TITLE III

NO. 17 BK 3283- LTS

CLAIM. NUM.133537

AS representative of

THE COMMONWEALTH OF PUERTO RICO,
ET A., DEBTOR.

**TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE
COMMONWEALTH PF PUERTO RICO, et al., Debtors:**

**HONORABLE JUEZ: LAURA TAYLOR SWAIN. UNITED STATES DITRIT COURT,
UNITED STATES. DITRIT COURT FOR THE DISTRICT OF PUERTO RICO.**

RESPECTFULLY REQUEST

MOTION:

HONORABLE UNITED STATES DITRIT COURT FOR THE DISTRICT OF
PUERTO RICO/ UNITED STATES DISTRICT COURT FOR THE DISTRICT
OF PUERTO RICO AND HON. JUDGE LAURA TAYLOR SWAIN, I APPLY
TO YOUR BENEVOLENCE TO RESPECTFULLY SEEK AND REQUEST
YOUR INDULGENCE, SO THAT THE ARGUMENTS PRESENTED HERE
HUMBLY BE CONSIDERED AND I MAY BE GIVEN THE OPPORTUNITY
TO ACCEPT THE MOTION FILED ON APRIL 15, 2022, WITHOUT
PREJUDICE, AMENDED, BY THE MOTION OF MARCH 2, 2022, FILED IN
THE ENGLISH LANGUAGE AND WITH A CHANGE IN AMOUNT OF
\$250,000.00, AS A REGULAR AMENDMENT, TO THE MOTION OF APRIL

15, 2022, FILED IN THE SPANISH LANGUAGE, THE WHICH PRESENTED AN AMOUNT OF \$54,000.00.

María A. Clemente Rosa appears, PETITIONER, CLAIM NO. 133537. CASE NUMBER: 17BK 03283-LTS respectfully addresses, exposes, alleges and requests:

LIST OF FACTS:

1. Honorable Judge Laura Taylor Swain, respectfully addressing you hereby express my sincere apology for ignoring the protocol of not "REQUEST A REGULAR AMENDMENT TO THE CHANGE OF THE GUIDED AMOUNT IN THE MOTION OF APRIL 15, 2022 I beg a thousand apologies to you, Honorable Judge: Laura Taylor Swain, and to the Honorable Court of the Federal Court of the United States and to the Representatives of The Commonwealth Of Puerto Rico et al., The Financial Oversight And Management Board For Puerto Rico.

2. Honorable Judge: Laura Taylor Swain, respectfully addresses you by this means and I expose part of our Historical Background, to bring in time and space the reality of Puerto Rico, in the 21st century (June 2022). Barely 4 months (March 2022), of the Hon. Governor of Puerto Rico, Atty. Pedro Pierluisis, having signed agreements with the Fiscal Control Board, for the Puerto Rico Restructuring Plan process. We see how Puerto Rico is going through a Corruption Scheme that allegedly involves: Mayors, Legislators, Government Officials, among others. A scheme of corruption and fraud, which is validated by one of the main sources of the country, the Press of Puerto Rico.

Recently "El Vocero" newspaper presented an article, which is our base argument, to establish the reliability of my arguments presented in this Motion, respectfully before you, Hon. Judge Laura Taylor Swain. According to the newspaper El Vocero. On Wednesday, May 18, 2022. The newspaper "El Vocero" published an article that reads as follows and I quote: "Corruption schemes could stop more capital from arriving" "Interviewees analyze possible effects of federal investigations on politicians and an international bank". Page 27. (See Appendix 1)

3. According to the analysis of the economist Sergio Marxuach, Director of Public Policy of the Center for a New Economy, shares his analysis on the subject of the economy of Puerto Rico. He establishes that when the Concept of "Tax Reform" is analyzed from the legislative approach and I quote: "this has become a complex network of preferential tax rates superimposed on multiple credits, deductions, exclusions and exemptions that in many cases are not justified. In addition, it imposes high marginal rates on income, placing the greatest burden on the middle class." I close the appointment. (See Appendix 2).

4. Hon. Judge: Laura Taylor Swain, I responsibly present another data that justifies, that confirms our economic crisis is the inaction of the Government and the pertinent agencies to put to work and implement the Highway Adjustment Plans. This argument is confirmed in the decision made by the Honorable Judge: Laura Taylor Swain, to Implement the Highway Adjustment Plan. The newspaper "El Nuevo Día" published on Friday, May 6, 2022, in the Business area: and I quote: "Swain gives way to the Highway Adjustment Plan" "The process to analyze the Information Statement and then confirm the restructuring it will begin next June 17" "One of the main causes of the present fiscal crisis is due to not having adjusted toll rates since 2005". (See appendix 3).

5. Hon. Judge Laura Taylor Swain, I respectfully present that according to the economist, Sergio Marxuach, Director of Public Policy of the Center for a New Economy, in his article, presents Puerto Rico, it has not complied with apparently developing a Tax Reform, since fifteen years ago. You have tried but these do not finish your deployment. Sad analysis. Because that was an important issue that would contribute to the socioeconomic and political development of Puerto Rico and Puerto Ricans. However, since the last 10 years, Puerto Rico has been clouded by the apparent and alleged Syndrome of Corruption and Fraud, where some Mayors of some towns, Directors and heads of Government Agencies, senators and legislators, among others, have been accused. Where this scheme obstructs Puerto Rico from having a fair, adequate and reasonable Tax Reform that benefits the people and not its officials. And to the implementation of the Restructuring Plan according to the Fiscal Control Board.

6. In the same way, this fraud scheme apparently also obstructs the payment of salary adjustments owed to the teaching public employee, from the central government, and the

payment of salary adjustments owed to teachers under the Career Law. Magisterial Law, 158, amended by Law No. 9 of March 7, 2022, Law No. 66 of June 17, 2014, as amended, known as the "Special Law, Law etc. (See Appendix 4).

7. Among this apparent fraud scheme are the following mayors, legislators and agency heads, See Appendix 5 and 6). And I quote:

16. Among other officials who have cases of Public corruption at the Federal Level from 2020 to the Present. See Appendix 6). And I quote:

1. Former Mayor of Humacao, Reinaldo "Rey" Vargas Rodríguez.
2. Former Mayor of Aguas Buenas, Javier García Pérez.
3. Former Mayor of Cataño, Félix Delgado Montalvo. (See Appendix 6).
4. Former Mayor of Guayama, Eduardo Cintrón
5. Former Mayor of Guaynabo, Ángel Pérez Otero.
6. Luis Arroyo Chiques
7. The former special assistant of Trujillo Alto, Radamés Benítez Cardona.
8. Julia B. Keleher – Former Secretary of Education - Convicted
9. Ariel Gutiérrez Rodríguez - Real Estate Entrepreneur – Convicted
10. Nelson Del Valle Colón – Former Representative – Convicted
11. Mildred Estrada Rojas- Former Legislative Employee – Convicted
12. María Milagros Charbonier Laureano – Former representative – Awaiting trial
13. Joseph Fuentes Fernández- President of the Super PAC Save Puerto Rico - Convicted.
14. Luis Rodríguez García- Police – Convicted
15. Arcadia Zorrilla Hernández – Officer of the Metropolitan Detention Center - Awaiting trial.
16. Among other officials who have cases of Public corruption at the Federal Level from 2020 to the Present. See Appendix 6).

8. Validation arguments, The Chief of the Federal Prosecutor's Office in Puerto Rico, Stephen Muldrow, pointed out that the authorities are investigating more cases of possible acts of corruption in the municipalities. The newspaper "El Nuevo Día" published on Friday, May 6, 2022. And I quote: "They point to "a corrupt germ" "Urgent oversight of the government and the voters"

a. Experts in Public Administration list the possible factors that give way to acts of corruption.

By Gloria Ruiz Kuilan, and I quote: "The wave of corruption cases led by mayors has reached the current level due to elements both individual and related to the public apparatus, such as a lack of ethics, the relaxation of controls, little oversight and the laxity in the selection Criteria, say the Professors in Public Administration Víctor Rivera Hernández and Palmira Ríos". (See Appendix 7).

9. Hon. Judge once respectfully presented our Historical base where Puerto Rico is developed, in the XXI century, (2022). The lawyers representing the debtor Party request the affected party (The Creditors) to present evidence, duplicity of evidence and even apparently establish that the Creditors are making duplicity of claims. No apparent evidence to substantiate his argument.

Honorable Judge Laura Taylor Swain, I respectfully state and present that the other forum to which Ms. María A. Clemente Rosa could go to request a payment for claiming the Teaching Career Law, would be in the Department of Education, Office of Teaching Career, and in that office, Mrs. Mara, gave me a yellow piece of paper, where she stated that as of this date of April 28, 2022, when I visit her, the Professional Improvement Plan, of the Teaching Career, of Level IV is still , Doctorate, submitted, for the year 2012; is still for evaluation. Therefore I have been writing both to the Office of the Secretary and to the Office of Fortaleza, of the Governor, Hon. Pedro Pierluisi, so that the apparent and alleged inaction and administrative negligence on the part of Ms. Mara and the management personnel of the Office of the Teaching Career, the Department of Education, Insurer X and So-and-so, before the application of the Law No. 170 of August 12, 1988, as amended, Law No. 38 of June 30, 2017, as amended, known as the "Uniform

Administrative Procedures Act of the Commonwealth of Puerto Rico", was created for the purpose to provide citizens with public services of high quality, efficiency, care, promptness and applying and interpreting liberally in order to achieve said purposes with the protection of the basic guarantees of due process of law. It establishes a uniform judicial review procedure for the action taken by a government agency in adopting a regulation or adjudicating a case. Among other things, it also provides for the maximum use of informal procedures before exhausting the formal decision-making stage.

Given these facts of apparent and alleged negligence and inaction on the part of the staff of the Teaching Career Office of the Department of Education, Hon. Judge, Laura Taylor Swain, there is no duplication of claim on the part of Mrs. María A. Clemente Rosa, as presented by the debtor, before the Honorable Judge, Laura Taylor Swain and the Honorable Federal Court of the United States, District of Puerto Rico.

10. Honorable Judge, Laura Taylor Swain and Honorable Federal Court of the United States, District of Puerto Rico, in view of the arguments presented above, I respectfully request that the Payment Process be investigated, if any, (June 2022), which is carrying out the Teaching Career Office, Department of Education of Puerto Rico, before the Legislation presented by the Hon. Lcdo. Pedro Pierluisi, under the Teaching Career Law, through Law No. 9 of March 7, 2022.

11. That the apparent and alleged noncompliance that the Teaching Career Office of the Department of Education, attached to the Government of Puerto Rico, is carrying out with Law No. 9 of March 7, 2022, which establishes carrying out the salary adjustment of all Participating Teachers of the Teaching Career Law, and that he be paid for the years 2014-2015 during the closing of Fiscal Year 2022-2223. For more information, I respectfully inform that on April 28, 2022, Mr. Nelson Cruz-Hernandez, from the Budget Office, showed me a PDF document, where apparently salary adjustments are being prepared with the funds to pay for the Law. Teaching Career, for people who apparently are not teachers or teachers. Apparently and allegedly we can see another Fraud scheme on the part of the Office of the Teaching Career, of the Department of Education, of the Commonwealth.

12. Honorable Judge Laura Taylor Swain, addresses you very respectfully, to establish another argument as a list of facts, fundamental to be considered before your

benevolence, the request of Mrs. María A. Clemente Rosa, which states: "HUMBLY REQUEST THE ACCEPTANCE OF THE MOTION FILED ON APRIL 15, 2022, WITHOUT PREJUDICE, AS AMENDED, IN THE MOTION OF MARCH 2, 2022, FILED IN THE ENGLISH LANGUAGE AND WITH A CHANGE OF AMOUNT OF \$250,000.00, AS A REGULAR AMENDMENT, TO THE MOTION FROM APRIL 15, 2022, PRESENTED IN THE SPANISH LANGUAGE, WHICH PRESENTED AN AMOUNT OF \$54,000.00.

a. The fact is as follows: According to the information provided by the Agencies that have the Legislation to compensate the public employee, apparently they are legislating that the Compensation Offered by the agreements of the Restructuring Plan, by the Fiscal Control Board, could have repercussion, in the pensions of the retirees of the government.

13. Honorable Judge: Laura Taylor Swain, I respectfully state that this discovery of evidence and information, which I have presented in relation to the Funds collected from the Management and Budget Agency of the Government of Puerto Rico and the Department of Education, and that apparently are designated to make payments, but apparently not to a teacher, makes it urgent that the Computer of Mr. Nelson Cruz-Hernandez, from the Budget Office of the Department of Education at the Federal Level, be investigated and the origin of the item be investigated. Document in PDF and who authorized him to make said salary adjustments, and who are the names of the list that appear in the PDF, and if these people comply with and submitted any documentation, Related to "THE PROFESSIONAL IMPROVEMENT PLAN FOR TEACHERS".

14. Honorable Judge: Laura Taylor Swain, I respectfully state that I referred said action carried out by Mr. Nelson Cruz-Hernández, with an apparent and allegedly nebulous and irresponsible scheme, to the Pertinent Offices, without receiving any response. Letter was sent to the Office of the Secretary of Education on May 27, 2022, and a letter was sent to the Office of Strength of the Hon. Governor of Puerto Rico. . (See Appendix 7). *MS*

15. Honorable Judge: Laura Taylor Swain, I respectfully state and beg you to accept the amendment presented in the Motion of April 15, 2022, as amended, and the increase in

amount as a Remedy for \$250,000.00, different from the amount of the Initial motion, for damages already received. And according to the valuation of the damages received and the damages that I will receive, since apparently in Puerto Rico, no payments will be made to public employees for the concept of the amended Laws that cover teachers of the Department of Education.

16. Honorable Judge: Laura Taylor Swain, respectfully, I expose, request and beg and turn to your benevolence, so that you are the one who evaluates and determines, if it is favorable and if the Amendment of the Motion of April 15, 2022 is accepted, filed before you on May 2, 2022. since the party representing the Debtors, the employed professionals, in debt adjustment cases involving Puerto Rico, request the rejection of the Motion of April 15, 2022, as amended , because it presents a change in the Remedy (Amount) initially requested by Mrs. Clemente – Rosa.

17 .Hon. Judge, Laura Taylor Swain, I respectfully state and confirm that my claims are proper, fair, and reasonable. And they were registered under the Promise Law in 2018, and that the compensation is based on the valuation of the damages received and I am waiting for the Fiscal Control Board and the Restructuring of the Plan, before the Honorable Judge Laura Taylor Swain and the Honorable Federal Court of the United States, district of Puerto Rico.

18 .And that my statements, to the best of my knowledge, are true. And I certify that I have no connection with the Debtors, nor with services offered to the Fiscal Control Board, for this reason there is no conflict of interest in my requested claims. And much less am I violating the Recent Law “The PRRADA, 48 USC 2178,” and I quote: “The Puerto Rico Recovery Accuracy in Disclosures Act of 2018 (PRRADA, for its acronym in English),” which is authored by Congresswoman Nydia Velázquez and which became law on January 20, 2022.

Given this approach, the Hon. Judge, Laura Taylor Swain, I respectfully request and beg that the Regular Amendment be accepted, of the Motion of April 15, 2022, amended by the Motion of May 2, 2022, that the evidence be accepted respectfully submitted in the appendices and in the full Motion and be granted the humbly requested relief of \$250,000.00 in damages. When the Fiscal Control Board finalizes the Restructuring Plan,

of the PROMESA law and the Honorable Judge Laura Taylor Swain and the Honorable Federal Court of the United States, District of Puerto Rico, kindly grant the go-ahead.

19 .Hon. Judge Laura Taylor Swain, I respectfully express other reasons, for which I beg you to accept The Regular Amendment, of the Motion of April 15, 2022. It is because of the Corruption Scheme presented by Puerto Rico, (2022), in the Government, reflected in the Mayors, in the Legislators and Heads of Offices, both private and governmental, and allegedly in the former Executive Officers of the Government, where they have revealed an economically unstable and unsustainable government infrastructure and allegedly where the possibility of fulfilling with payments to creditors it looks uphill. It seems impossible to achieve, if your Plan is not respectfully implemented, Hon. Judge Laura Taylor Swain, to comply with the economic adjustment and Restructuring Plan and payments to creditors.

Since the Fraud and Corruption Scheme has been Billionaire. The Government's economic coffers are apparently empty. And if these convicts are not asked to return the apparently stolen money, the pay of the creditors will be further away, especially public employees, the teaching class, who live with a very poor and unsustainable pension, before a Puerto Rico, with high cost of living.

20 Hon. Judge Laura Taylor Swain, respectfully stated that it is important to establish a compulsory mechanism, so that these groups of mayors, representatives, legislators and government officials have apparently and allegedly been prosecuted on charges of corruption and fraud against federal funds where apparently benefited from any monetary, economic or pecuniary compensation, and privileges to obtain an auction, be forced to return the last penny they took from the money of the people of Puerto Rico. Since these criminal behaviors are the ones that have affected compliance with labor laws, fair tax reforms, payments to creditors, to public employees for concepts of retirement laws, bonuses, salary increases for teachers, which have been seen tarnished in our Puerto Rican historiography.

21. Honorable Judge Laura Taylor Swain, I respectfully present other arguments evidenced in our Front Page of the newspapers El Vocero, Primera Hora and el Nuevo Día.

a. On Tuesday, May 22, 2022, the newspaper "El Vocero" presents on the front page and I quote: "FOLLOW THE PULSEO FOR MONEY FOR THE MUNICIPALITIES" "While mayors maintain that the municipalities would be inoperative if they do not have the Equalization Fund, the fiscal board urges them to "adopt bold ideas rather than expect continued bailouts." Q.6 (See Appendix 9).

b. Other cases of Hidden Money. Newspaper "The New Day". On Friday, May 6, 2022, I publish "HIDDEN MONEY SCHEME" "OTHERS INVOLVED WILL NOT BE PROCESSED" Page 6. (See Appendix 10.). Other cases of Conflict of Interest.

c. The newspaper "El Nuevo Día" published: on Wednesday, May 25, 2022. And I quote: "Firm O'Neill & Borges will not be able to represent the Board." Page 37. (See Appendix 11).

d. The newspaper "El Nuevo Día" published: On Wednesday, June 1, 2022. And I quote: "Bondholders will seek the dismissal of PREPA's bankruptcy. (See Appendix 12)

22 .Honorable Judge Laura Taylor Swain, I respectfully express my analysis before these facts and arguments of so much corruption that are airing in Puerto Rico, and that they are allegedly being prosecuted by the Office of the Panel on the Special Independent Prosecutor, allegedly about the Mayor of Mayagüez, Mr. Ex-Mayor José Guillermo "Guillito" Rodríguez, and other mayors, clearly evidence the dishonesty, the lack of values of these convicted representatives and the lack of a comprehensive government that works in social welfare - economic and political for the people and not for them. For Our public teachers, students, teachers, our University System, Health, the Infrastructure of a better Educational System, and sports in schools. Breaking the barriers of discrimination, by race, politics, social and gender. (See appendix 13).

23 .Honorable Judge Laura Taylor Swain, I respectfully express a fundamental argument, which complements the other facts and validates my request that the Regular

Amendment, presented in the Motion of April 15, 2022, be accepted, as amended, on the increase in the amount presented as part of the requested remedy from \$54,000.00 to \$250,000.00. The argument that I am using as validation to my request continues to be confirmed with the aforementioned and analyzed data and those that we present below:

a. On Wednesday, June 1, 2022. The Newspaper "El Vocero", presents on its Front Page the Headline: and I quote: "CAMERA OFFERS ITS RECIPE FOR PREPA: "The president of the body, Rafael "Tatito" Hernández, files a measure seeking to impose a haircut of at least 75% on the corporation's bond debt and a rate for electricity service of less than 20 cents per kilowatt hour. Q6. (See Appendix 14).

b. On Wednesday, June 1, 2022. The newspaper "El Vocero", presents on page 10, what is presented here as the second attempt by the Legislature to intervene in the Prepaid restructuring process. I quote: "The president of the House of Representatives, Rafael "Tatito" Hernández, and the popular delegation presented a proposal for the restructuring of the Electric Power Authority (PREPA) that includes a 75% cut in the debt with the bondholders, priority of payment to the retirement system of the employees of the public corporation and to the employer contributions and that there is a rate of less than 20 cents per kilowatt/hour for the electricity service." (See Appendix 15).

24 .Hon. Judge Laura Taylor Swain, I respectfully request and beg that the President of the Chamber, Hon. Rafael "Tatito" Hernández, and the popular delegation of that body of the Legislature not be allowed to succeed in their proposal, since they are allegedly trying to intervene, for the second time, in the restructuring process of PREPA, after you Honorable Judge, Laura Taylor Swain, ruled, "the closure of the step to participate in the confidential mediation process between the interested parties." According to you. Hon. Judge Taylor-Swain, "established it through the Case of

Title III (bankruptcy) of the Law for Supervision, Administration and Economic Stability of Puerto Rico”.

25 Hon. Judge Taylor-Swain, I respectfully state that if we analyze said measure proposed by Hon. Hernández, we can see that there is no economic stability that benefits the people, it benefits PREPA, which has a debt that exceeds \$8,000. Millions. And how would the creditors, affected by that debtor, charge. Who would really benefit, in the reduction of 75% of the debt to PREPA, is PREPA Company, the 20 cents discount per kilowatt/hour for the electricity service, it would not be any benefit for the people, that is another apparent profit strategy for the Debtors. Currently the cost per gallon of oil is increasing as well as gasoline, for this reason that savings represent 20 cents, proposed by the President of the Chamber, Hon. Rafael "Tatito" Hernández, and the popular delegation. This measure is not cost-effective, if not, a fair, adequate and reasonable payment mediation is reached for the creditors. And the discount should be \$2.00 per kilowatt hour for electricity service.

26. Honorable Judge Laura Taylor Swain, I respectfully express and present that the legal representation of the debtor opposes my acceptance of my Regular Amendment, presented on April 15, 2022, amended, alleged and apparently they are designing strategies with the debtors, about presenting Motions, to establish that: "They want to get out of the Title III Case" (bankruptcy) assuming that they have the solvency to mediate a process to pay and want to enter into negotiation, with the creditors.

However, this action, on the part of the debtors, would be correct if what is really wanted is to reach a fair, adequate and reasonable negotiation of payment to the creditors. Otherwise, if that is not the real negotiation requested, on the part of the debtor, then apparently the Debtor Party would be acting against its own actions, because said debtors, when they entered to participate in the Title III case, were supposedly in bankruptcy. If they are given the opportunity to enter into a payment negotiation process with the creditors, under the Laws of the State Government, it would be a punishment for the creditors, because apparently they would have to re-file Claims and Motions in the Court of First Instance, in Puerto Rico, to start a lawsuit process to claim payment. Thus violating what was established under the Promise Law.

27 .Honorable Judge Laura Taylor Swain, I respectfully state that the other reason for the debtor party to refuse to accept the Regular Amendment, submitted on April 15, 2022, as amended, is apparently to lead their representatives to delay the payment process to creditors and/or evade their payment responsibility before Mrs. María A. Clemente Rosa, for all her claims made, filed and registered in 2018, so that they are properly and reasonably addressed by the Fiscal Control Board, under the Promise Law, in the Restructuring of the Plan and before the Honorable Judge: Laura Taylor Swain and the Honorable Federal Court of the United States, District of Puerto Rico.

28. Given these alleged and apparent alleged actions on the part of the debtors' representatives, it is that they are opposed to Ms. María A. Clemente Rosa, present to the Honorable Judge: Laura Taylor Swain and to the Honorable Federal Court of the United States, District of Puerto Rico, An Amendment to the Motion of April 15, 2022, and that it be respectfully requested that If the same is accepted, because the conditions of mediation and negotiation between debtor and creditor would be different, the controversies between the two would increase due to the new allegations of rights that Ms. María A. Clemente Rosa possesses.

29 .The Title III process directly affects not only the holders of bonds issued by the government and COFINA, but also all those creditors (Ms. María A. Clemente Rosa) and suppliers to whom money is owed. The filing of cases under Title III has an economic impact on all creditors who are in said process.

30 .According to the Law for the Supervision, Administration and Economic Stability of Puerto Rico (Promise Law in English), and presented in sections 362 and 922 of the Federal Bankruptcy Code, the filing of cases under Title III activated a stay of the judicial or extrajudicial actions to collect money from all creditors against the government of Puerto Rico and COFINA, as well as the actions against its officials and inhabitants —if the claim is intended to enforce a claim against the government—; and the execution of a lien against taxes owed to the government. So the claim is valid.

31 .Honorable Judge Laura Taylor Swain. It is addressed to you very respectfully, to present that before these statutes that the Promise Law provides, it is that since the year 2018, I have carried out my claims, I have registered them, I have made my Claim Motions, My Amendments, all with the due Law Procedure that has been required under

the Honorable Federal Court of the United States District of Puerto Rico and before you, Honorable Federal Judge Hon. Laura Taylor Swain, so that according to law they are registered, accounted for and taken into account by the Fiscal Control Board, in the process of the Restructuring Plan.

32 .Honorable Judge Laura Taylor Swain. Mrs. María A. Clemente Rosa respectfully addresses you to present and certify, to the best of my knowledge, that the arguments presented in this Humble Petition for a Total Regular Amendment are valid and reliable since they are obtained from the sources of the newspapers with the largest circulation in Puerto Rico.

33 .Honorable Judge Laura Taylor Swain. Mrs. María A. Clemente Rosa addresses you very respectfully, and I turn to your benevolence and beg you to accept the Motion for the Regular Amendment request, presented on April 15, 2022, amended where it presents an increase in the amount of the remedy for damages from \$54,000.00 to \$250,000.00 and that it be your benevolence, the one that evaluates and exercises its criteria on whether the modification and the Regular Amendment of April 15, 2022 proceed, in law or in equity.

34. Presentation of other documents for the justification of the Motion: Regular Amendment, of April 15, 2022. (See Appendix 16).

I come to your Benevolence, Hon. Laura Taylor Swain. Judge: Hon. Laura Taylor Swain, of the United States District Court and TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors: UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO, to grant me your leniency and accept the Amendment of the Motion of April 15, 2022, amended by Motion of May 2, 2022, that the evidence respectfully presented in the appendices and in the full body of the Motion and that I be humbly awarded the relief of \$250,000.0 in damages.
RESPECTFULLY REQUESTED.

I CERTIFY that on this same date I have sent by CERTIFIED mail a true and exact copy of this TO THE HONORABLE BOARD THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH PF PUERTO RICO, et al., Debtors:

In Carolina, Puerto Rico today June 7, 2022

A handwritten signature in blue ink, appearing to read 'María A. Clemente Rosa', is written over the printed name.

María A. Clemente Rosa
Astralis Condominium 9546
Calle Diaz Way, Apt 311
Tower # 6 Carolina, P.R. 00979
Phone (787)385-2906

Date Filed: 6/29/2018
Case Number: 17 BK 03283-LTS
DEBTOR: Commonwealth of Puerto Rico
CLAIM: NO. 133537